

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: March 1, 2019

Name of company covered by this certification: Ligado Networks Subsidiary LLC

Form 499 Filer ID: 821578

Name of Signatory: Beth Creary

Title of Signatory: Vice President & Assistant General Counsel

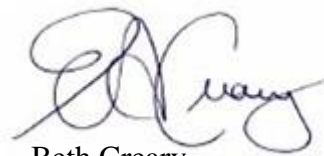
I, Beth Creary, Vice President & Assistant General Counsel of Ligado Networks Subsidiary LLC (“Ligado”), certify that I am an officer of Ligado, and acting as an agent of the company, that I have personal knowledge that Ligado has established operating procedures that are adequate to ensure its compliance with the Commission’s CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Ligado’s procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission’s rules. As explained therein, because Ligado does not have access to any CPNI, such compliance is assured.

Ligado has not taken any actions against data brokers in the past year.

Ligado has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.



Beth Creary
Vice President &
Assistant General Counsel

Statement Regarding Compliance with CPNI Regulations

Ligado Networks Subsidiary LLC (“Ligado”) is authorized to operate as a common carrier in the United States. However, at this time Ligado is not providing any telecommunications services to end-user customers. Rather, Ligado operates as a wholesale provider of satellite services. Ligado does not have access to CPNI related to the end users served by Ligado’s wholesale customers, which hold all CPNI with respect to those end users. Because Ligado does not have access to any such CPNI, compliance by Ligado with the Commission’s CPNI rules is assured. Nevertheless, we note that Ligado previously had implemented a robust CPNI compliance program, and that Ligado would implement a similar program if, in the future, it begins providing telecommunications services to end users or otherwise has access to CPNI.